



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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SPN/MKM/KDE/PTH/KTF

*271 Cadman Plaza East  
Brooklyn, New York 11201*

December 30, 2020

By ECF

The Honorable Pamela K. Chen  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re:     United States v. Hernan Lopez, et al.  
Criminal Docket No. 15-252 (S-3) (PKC)

Dear Judge Chen:

The government respectfully writes to request an extension of time, from January 6, 2021 to January 15, 2021, for the government to file a letter summarizing the categories of documents obtained from Fox and Torneos that it does not intend to produce to the defendants and explaining why those documents are not discoverable under Federal Rule of Criminal Procedure 16(a), Brady, or otherwise. See ECF Order dated Nov. 20, 2020. Among other things, the additional time will permit the government to complete its review and classification of documents amid periodic technical and related difficulties arising from the need to manage and review data remotely during the current public health context. Counsel for the defendants have been consulted and consent to this request.

Respectfully submitted,

SETH D. DUCHARME  
Acting United States Attorney

By:     \_\_\_\_\_  
/s/  
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cc:     Counsel of record (by ECF)  
Clerk of Court (PKC) (by ECF)